

The Honorable J. Kelley Arnold

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

RICKEY PERALEZ, on behalf of
himself and others similarly situated,

Plaintiff,

v.

THE WASHINGTON STATE
DEPARTMENT OF CORRECTIONS;
HAROLD CLARKE; DOUGLAS
WADDINGTON; BELINDA
STEWART; KEVIN SHANAHAN;
JEAN STEWART; and JOHN DOES 1-
20, employees and officials of the
Washington Department of Corrections
and/or Stafford Creek Corrections Center,

Defendants.

NO. C06-5625 JKA

DEFENDANTS' FINAL REPORT
TO THE COURT

Please take notice that the defendant Washington Department of Corrections has
complied with all the requirements of the Settlement Agreement (Dkt 59) as enumerated in the

1 attached Declaration of Holly Delcambre and spreadsheet (Exhibit 1). Defendants request an
2 Order closing the file.

3
4 DATED this 11th day of March, 2010.

5 ROB MCKENNA
6 Attorney General

7 /s/Mark C. Jobson
8 MARK C. JOBSON, WSBA No. 22171
9 Assistant Attorney General

10 **CERTIFICATE OF SERVICE**

11 I hereby certify that on March 11, 2010, I caused to be electronically filed the
12 foregoing document with the Clerk of the Court using the CM/ECF system which will send
13 notification of such filing to the following:

14 **Attorney for Plaintiffs:**

15 **Edwin S. Budge**
16 **Erik J. Heipt**

17 /s/Cynthia A. Meyer
18 CYNTHIA A. MEYER, Legal
19 Assistant for
20 MARK C. JOBSON, WSBA #22171
21 Assistant Attorney General
22 Torts Division
23 P.O. Box 40126
24 Olympia, WA 98504-0126
25 (360) 586-6300
26

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20, employees and officials of the
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DECLARATION OF
HOLLY DELCAMBRE

I, Holly Delcambre, being over the age of 18 years and competent to testify, make the
following declaration based on personal knowledge:

1. I am the ADA Compliance Manager for the Washington State Department of
Corrections.

DECLARATION OF HOLLY
DELCAMBRE -- NO. C06-5625

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ATTORNEY GENERAL OF WASHINGTON
Torts Division
7141 Cleanwater Drive SW
PO Box 40126
Olympia, WA 98504-0126
(360) 586-6300

Perales vs State ADA Improvements

Item	FR	PO	Vendor	Actual / Projected Expenditures	AFRS Expenditures
CRCC accessible dining room tables				\$ 2,477.32	
PHWR Shower remodel			Centennial Contractors Ent	68,505.96	68,505.96
ECWR Sidewalk Repair			Centennial Contractors Ent	34,563.82	34,563.82
BSWR Door Openers/Parking Stall/Lower Fixtures			Centennial Contractors Ent	14,626.67	14,626.67
RWR Elevator Key Card	0948634	0958813	Kone Inc.	7,989.12	7,989.12
RWR Elevator Key Card		1063122	Kone Inc.	1,177.12	1,177.12
Evacuation Chairs	0947305, 0958813	1063322	US Bank Purchasing Card	3,130.00	3,130.00
CCTV	0936020		Community Services F/T Blind &	985.50	
Brailier	0947774	0958541	Community Services F/T Blind &	328.50	328.50
Headphones	0947772		US Bank Purchasing Card - Am	106.85	106.85
Law Library Access x 3					
Zoom Text / JAWS / Kerzwell	0950769	0961319	Community Services F/T Blind &	8,739.68	8,739.68
PC	0950781	0961323	Dell	3,387.00	3,387.00
Printer	0950774		Software House Int'l	532.82	532.82
Scanner	0950773	0961349	Software House Int'l	828.84	828.84
Office -2007	0950775	0961321	DIS	797.99	797.99
Hard of Hearing Access					
Pocket talker	0950789		US Bank Purchasing Card	1,110.98	1,110.98
MSRP FM System	0950789		Hearing Speech & Deafness Ctr	0.00	0.00
Bariatric Transfer Benches -WCCW, WSP, WCC, AHCC	0953331	1063312	Ebay	875.70	875.70
Hand Held Shower system - WCC	0953321	1063318	Plumber Surplus	359.47	359.47
Grab Bars/Wheelchair access/WCC	0953321	1063319	Grab Bars Direct	1,592.09	1,592.09
Accessible Shower Heads SOU	0954396	1063320	Grainger On Line	68.91	68.91
Pulls - Shower Access E unit SOU	1054397	1063461	Western Detention	450.58	450.58
Shower Grab Bar Wall to floor - WCC	1054162	1063684	Accessible Environments.Net	510.00	510.00
Wheelchairs - 5 MCC, 5 CRCC	1055450	1063786, 1063791	1800wheelchair.com	2,069.10	2,069.10
ADA Code Tape	1055449	1064027	EF Bailey	830.40	
CCTVs/Library (visually impaired) / Braille Labelers / Braille Labeling Tape	1054154	1064180	Community Services F/T Blind	1,690.31	1,690.31
Superprint TTY	1054160	3410	HSDC - Visa	2,178.60	2,178.60
Wheelchair WCCW	1055450	1063786	1800wheelchair.com	209.00	209.00
P200 Coding - AI 256			P300 Total	160,122.33	155,829.11
Bariatric Wheelchair	1055039	1063722	Spinlife.com	899.00	899.00
Bariatric Wheelchair	1055039	1063728	Spinlife.com	1,798.00	1,798.00
Matting for Accessible showers SOU	1054400	1064268	McMaster-Carr	1,228.92	1,228.92
Matting for Accessible showers SOU	1054400	1064282	McMaster-Carr	558.60	558.60
WC Cushion, Beasy Board, Transfer Chair MCC	1055032	1063769	Allegro Medical	1,109.15	1,109.15
Shower Chairs	1054161	1063177	Free Ship Medical	3,398.00	3,398.00
			P200 Total	8,991.67	8,991.67
Total			Total Perales vs State Funding Difference To Spend	169,114.00	164,820.78
				169,114.00	0.00